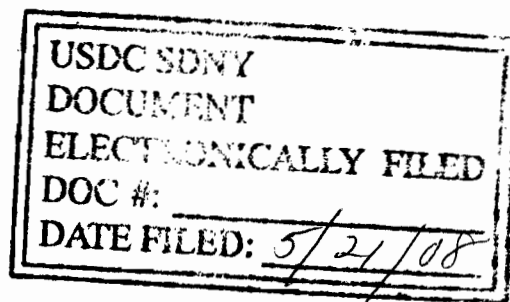


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(212) 813-1600

*Attorneys for Plaintiffs*



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
VAN CLEEF & ARPELS LOGISTICS, S.A., :  
VAN CLEEF & ARPELS, INC. and :  
VAN CLEEF & ARPELS DISTRIBUTION, INC., :

Plaintiffs, :

v. :

GOLDSTEIN JEWELERS and :  
JOHN DOES 1-10; :

Defendant. :  
-----X

Civil Action

No. ~~07-CV-1290~~ (SAS)

~~07-CV-1290~~

08 CV 3007 (SAS)

**[proposed] SCHEDULING ORDER**

WHEREAS, the Court has scheduled an initial conference for May 20, 2008; and

WHEREAS, the Court requires that the parties jointly prepare and sign a proposed  
scheduling order containing certain information;

NOW, THEREFORE, the parties hereby submit the following information:

- 1) The date of the conference and the appearances for the parties;

May 20, 2008

Tal S. Benschar, Esq.  
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Counsel for Plaintiffs

Kalpana Nagampalli, Esq.  
Feldman Law Group  
12 E. 41<sup>st</sup> Street  
New York, NY 10017  
Counsel for Defendant

2) A concise statement of the issues as they appear:

- Validity of copyrights and trade dress
- Copyright and trade dress infringement
- Amount of profits and damages
- Other relief

3) A schedule including:

(a) the names of persons to be deposed and a schedule of planned depositions:

- Corporate representatives of Defendants most knowledgeable about sales, advertising and marketing of items accused of infringement.
- Corporate representatives most knowledgeable of creation, ownership, sales, marketing and evidence of Plaintiff's case.

*June,*  
*July*  
*+*  
*August*

(b) a schedule for production of documents:

Defendants to produce overdue documents by May 28, 2008.

Plaintiffs responses to first set of interrogatories and requests for documents by June 23, 2008.

Plaintiffs to produce documents by June 23, 2008.

Other production of documents by July 15, 2008.

(c) dates by which (i) each experts reports will be supplied to the adverse side and (ii) each experts deposition will be completed;

Expert reports by September 15, 2008.

Rebuttal Expert Reports by October 6, 2008.

Expert Depositions to be completed by November 1, 2008.

(d) time when discovery is to be completed;

November 15, 2008.

(e) the date by which plaintiff will supply its pre-trial order matters to defendants:

December 1, 2008.

(f) the date by which the parties will submit a pre-trial order in a form conforming with the Court's instructions together with trial briefs and either (1) proposed findings of fact and conclusions of law for a non-jury trial, or (2) proposed jury instructions, for a jury trial; and

December 20, 2008.

(g) a space for the date for a final pre-trial conference pursuant to Fed. R. Civ. P. 16(d), to be filed in by the Court at the conference.

9/11 at 4<sup>30</sup>

4) Any statement of any limitations to be placed on discovery, including any protective or confidentiality orders;

Parties anticipate entry of a protective order.

5) A statement of those discovery issues, if any, on which counsel, after a good faith effort, were unable to reach an agreement;

None at this time.

6) Anticipated fields of expert testimony, if any;

Validity of the alleged trade dress and copyrights.

Infringement of the alleged trade dress and copyrights.

7) Anticipated length of trial and whether to court or jury;

2-3 days bench trial, maybe jury. To be decided at pre-trial conference.

8) **This Scheduling Order may be altered or amended only on a showing of good cause not foreseeable at the time of the conference or when justice so requires;**

9) Names, addresses, phone numbers and signatures of counsel;

Dated: May 20, 2008

KALOW & SPRINGUT, LLP

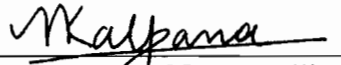


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*Counsel for Plaintiffs  
Van Cleef & Arpels Logistics, S.A.;  
Van Cleef & Arpels, Inc. and  
Van Cleef & Arpels Distribution, Inc.*

Dated: May 20, 2008

FELDMAN LAW GROUP



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Phone: (212) 532-8585 x17

*Counsel for Defendant  
Goldstein Jewelers*

SO ORDERED:

Dated: May 20, 2008



Hon. Shira A. Scheindlin, U.S.D.J.